

BOIES SCHILLER FLEXNER LLP

Mark C. Mao (CA Bar No. 236165)
mmao@bsflfp.com
Beko Reblitz-Richardson (CA Bar No.
238027)
brichardson@bsflfp.com
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
Telephone: (415) 293 6858
Facsimile: (415) 999 9695

SUSMAN GODFREY L.L.P.

William Christopher Carmody (*pro hac vice*)
bcarmody@susmangodfrey.com
Shawn J. Rabin (*pro hac vice*)
srabin@susmangodfrey.com
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019
Telephone: (212) 336-8330

MORGAN & MORGAN

John A. Yanchunis (*pro hac vice*)
jyanchunis@forthepeople.com
Ryan J. McGee (*pro hac vice*)
rmcgee@forthepeople.com
201 N. Franklin Street, 7th Floor
Tampa, FL 33602
Telephone: (813) 223-5505

*Attorneys for Plaintiffs; additional counsel
listed in signature blocks below*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ANIBAL RODRIGUEZ, JULIEANNA
MUNIZ, ELIZA CAMBAY, SAL CATALDO,
EMIR GOENAGA, JULIAN SANTIAGO,
HAROLD NYANJOM, KELLIE NYANJOM,
and SUSAN LYNN HARVEY, individually
and on behalf of all other similarly situated,

Plaintiffs,

v.

GOOGLE LLC

Defendants.

WILLKIE FARR & GALLAGHER LLP

Benedict Y. Hur (SBN: 224018)
bhur@willkie.com
Simona Agnolucci (SBN: 246943)
sagnolucci@willkie.com
Eduardo E. Santacana (SBN: 281668)
esantacana@willkie.com
Lori Arakaki (SBN: 315119)
larakaki@willkie.com
Argemira Florez (SBN: 311153)
aflorez@willkie.com
One Front Street, 34th Floor
San Francisco, CA 94111
Telephone: (415) 858-7400
Facsimile: (415) 858-7599

Attorneys for Defendant Google LLC

Case No. 3:20-cv-04688-RS

**JOINT STIPULATION AND [PROPOSED]
ORDER TO CONTINUE DISCOVERY
DEADLINES**

Judge: Hon. Richard Seeborg

Pursuant to Civil L.R. 6-2 and 7-12, this joint stipulation is entered into by and between Plaintiffs Anibal Rodriguez, et al and Defendant Google LLC (collectively, the “Parties”).

WHEREAS, the parties have been working to complete discovery in this case pursuant to the Court’s deadlines, and

WHEREAS, the pleadings have not yet been settled, and

WHEREAS, the case schedule allows for some flexibility in the fact discovery and expert disclosure deadlines without moving any other deadlines in the case, and

WHEREAS, the scope of discovery may change depending on the Court’s ruling on Google’s pending motion to dismiss (Dkt. 115), and

WHEREAS, the parties agree to negotiate in good faith whether and to what extent a second extension may be needed after the Court has issued an order on the pending motion to dismiss, and

WHEREAS, there have been no other extensions of the case schedule set by the Court;

NOW THEREFORE, the parties agree to the following:

- The parties agree to extend the fact discovery deadline (Dkt. 59) by 60 days to January 11, 2022.
- The parties agree to extend the expert disclosure date, which is currently set on December 13, 2021 (Dkt. 59), to January 11, 2022, to match the new discovery deadline.
- After the Court has issued an order on the pending motion to dismiss, the parties agree to meet and confer regarding other deadlines as needed.

DATED: August 13, 2021

By: /s/ James W. Lee

BOIES SCHILLER FLEXNER LLP

Mark C. Mao (CA Bar No. 236165)
mmao@bsflp.com
Beko Reblitz-Richardson (CA Bar No. 238027)
brichardson@bsflp.com
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
Telephone: (415) 293 6858
Facsimile (415) 999 9695

James W. Lee (pro hac vice)
jlee@bsfllp.com
Rossana Baeza (pro hac vice)
rbaeza@bsfllp.com
100 SE 2nd Street, Suite 2800
Miami, FL 33130
Telephone: (305) 539-8400
Facsimile: (305) 539-1304

Jesse Panuccio (pro hac vice)
jpanuccio@bsfllp.com
1401 New York Ave, NW
Washington, DC 20005
Telephone: (202) 237-2727
Facsimile: (202) 237-6131

SUSMAN GODFREY L.L.P.

Amanda Bonn (CA Bar No. 270891)
abonn@susmangodfrey.com
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Telephone: (310) 789-3100

William Christopher Carmody (pro hac vice)
bcarmody@susmangodfrey.com
Shawn J. Rabin (pro hac vice)
srabin@susmangodfrey.com
Steven Shepard (pro hac vice)
sshepard@susmangodfrey.com
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019
Telephone: (212) 336-8330

MORGAN & MORGAN

John A. Yanchunis (pro hac vice)
jyanchunis@forthepeople.com
Ryan J. McGee (pro hac vice)
rmcgee@forthepeople.com
Ra Olusegun Amen (pro hac vice)
ramen@forthepeople.com
201 N. Franklin Street, 7th Floor
Tampa, FL 33602
Telephone: (813) 223-5505

Attorneys for Plaintiffs

1
2 DATED: August 13, 2021

WILLKIE FARR & GALLAGHER, LLP

3 By: /s/ Eduardo E. Santacana

4 Eduardo E. Santacana (SBN: 281668)
5 esantacana@willkie.com

6 Benedict Y. Hur (SBN: 224018)
bhur@willkie.com

7 Simona Agnolucci (SBN: 246943)
sagnolucci@willkie.com

8 Lori Arakaki (SBN: 315119)
larakaki@willkie.com

9 Argemira Florez (SBN: 311153)
aflorez@willkie.com

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11 San Francisco, CA 94111

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14 *Attorneys for Defendant Google LLC*

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16 Plaintiffs,

17 v.

18 GOOGLE LLC

19 Defendants
20

Case No. 3:20-cv-04688-RS

[PROPOSED] ORDER

21 Pursuant to stipulation of the Parties, the Court hereby **ORDERS** that the discovery
22 deadline and expert disclosure deadline are extended until January 11, 2022.

23
24 **IT IS SO ORDERED.**

25
26 Dated: _____

The Honorable Richard Seeborg
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